

## **REMARKS**

Claims 1, 3-4, 6-7, 9-10, and 12 were presented for examination. The final Office Action dated September 22, 2006 rejects claims 1, 3-4, 6-7, 9-10, and 12. This paper amends claims 1 and 7. Claims 1, 3-4, 6-7, 9-10, and 12 remain pending in this application.

### **Rejection under 35 U.S.C. 103(a)**

The Office Action rejects claims 1, 3-4, 6-7, 9-10, and 12 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2001/0050914 to Akahane et al. ("Akahane") in view of Applicant's admitted prior art ("AAPA"). Applicants respectfully traverse the rejection.

The Applicants' invention, as now set forth in representative claim 1, recites, in pertinent part, a router that has a plurality of router interfaces. A separate routing table is dedicated to each domain and each router interface is associated with one of the routing tables. In addition, the router executes a single IP stack to receive a packet from any of the router interfaces and to identify the associated routing table for handling the packet.

Akahane discloses the use of separate routing tables for VPNs and a process for determining which routing table to use for forwarding a particular IP packet. However, as the Office Action states, Akahane does not expressly disclose executing a single IP stack to receive packets from any of the router interfaces. FIG. 4 of Akahane attests to this: packets arriving at physical interfaces 1 and 2 go through a different packet layer processor (52) than packets arriving at physical interfaces 3 and 4. Presumably, each packet layer processor employs its own IP stack before the packet passes to the switch.

Because Akahane lacks this particular feature of the Applicants' invention, the Office Action refers to paragraph [0003] of the Applicants' Background in order to suggest modifying Akahane to have only one IP stack that receives packets from any of the router interfaces. Granted, paragraph [0003] of the Applicants' Background does show a router running a single IP stack that receives packets from multiple interfaces. However, the network environment within which the router of paragraph [0003] operates does not have multiple addresses domains – rather, all of the interfaces connect to the same domain. Moreover, the router of paragraph [0003] has only a single routing table (i.e., unlike the Applicants' invention, which has a plurality of dedicated, separate routing tables, each dedicated to one of the multiple address domains). Therefore, interpreting paragraph [0003] to teach the general principle of using a single IP stack to receive packets from multiple interfaces, without taking into consideration the actual context within which this IP stack operates, suggests that paragraph [0003] has been selected, not for what it actually teaches, but because it contains, in name, the element missing from Akahane.

Absent from paragraph [0003], however, and, for that matter, from the rest of the Background, is the suggestion that one IP stack may be used to receive packets from any of the interfaces when there are multiple routing tables and multiple address domains. To the contrary, as is quite clear from paragraphs [0007] through [0009], the Background teaches the use of multiple IP stacks when there are multiple routing tables and multiple address domains. Thus one of ordinary skill in the art, presented with the Applicants' Background and Akahane, would not combine them to produce a single IP stack that receives a packet from any of the router interfaces, as set forth in the Applicants' claimed invention. This is because when there are

multiple routing tables dedicated to multiple address domains, as there are in Akahane, the Background teaches using multiple IP stacks. Any suggestion to use only one IP stack to receive a packet from any of the router interfaces, when there are multiple routing tables and multiple address domains, comes not from the Applicants' Background nor from Akahane, but from the Applicants' own invention.

Each other independent claim recites language similar to that of claim 1, and therefore is patentable for at least the reasons provided in connection with claim 1. Each dependent claim depends directly or indirectly from one of the patentable independent claims, and incorporates all of its respective limitations and, therefore, is patentably distinguishable over the cited references for at least those reasons provided in connection with the independent claims. Each dependent claim also recites an additional limitation, which, in combination with the elements and limitations of its independent claim, further distinguishes that dependent claim from the cited references. Applicants respectfully request withdrawal of the rejection of these claims.

### **CONCLUSION**

In view of the amendments and arguments made herein, Applicants submit that the application is in condition for allowance and requests early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicant's representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003.

Respectfully submitted,

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